



## Texthelp as Supplier Security Questionnaire

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**Texthelp as a supplier – information document for Texthelp Ltd., Texthelp Inc. & Texthelp PTY.**

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### Introduction

This document provides high-level details of Texthelp LTD, Texthelp INC and Texthelp PTY. The sections below describe the processes, procedures and controls employed to ensure the security of the data it processes or stores on behalf of its customers. It provides information on the company's Information Security Policy, Compliance, Support and Service Level Agreements, Human Resources Security, Technical Security, Communications Security, Access Control to information assets, the company's Business Continuity Management, the Physical Security and the maintenance of its infrastructure and premises.

### Company Information

Question	Comments / Answer
Please provide the name, address and details of Texthelp?	<b>Texthelp Ltd.</b> Lucas Exchange, Orchard Way, Greystone Road, Antrim BT41 2RU. Tel: 028 9442 8105. <b>VAT</b> <b>Number:</b> 325209132 <b>Company</b> <b>Registration</b> <b>Number:</b> NI31186  <b>Texthelp Inc.</b> 500 Unicorn Park Drive Woburn MA, 01801 Tel: 888-248-0652  <b>Texthelp Pty Ltd.</b> Suite G.6, Brisbane Technology Park, 35 Miles Platting Road, Eight Mile Plains, Queensland 4113.



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provide a copy of your latest audited annual accounts?	are public record and can be found on companies' house
Do you hold Public liability insurance?	Yes - details available on request
Do you hold Employers liability insurance?	Yes - details available on request
Are you certified to any information security, quality, business continuity standards such as ISO27001 & ISO9001?	Texthelp is certified to ISO 27001:2013. The certificate can be found <a href="#">here</a> .

## Product/Project information

Please provide a high-level description of the solutions/ services offered by Texthelp:	<p><b>Read&amp;Write</b> is a literacy support tool that offers help with everyday tasks like reading text out loud, understanding unfamiliar words, researching assignments and proofing written work.</p> <p><b>Equatio</b> is a powerful equation editor that makes it easy to create digital, accessible maths. It saves time, lowers stress and eliminates frustration. It makes maths and science more accessible and engaging for every student.</p> <p><b>Co:Writer</b> uses grammar-smart and vocabulary-smart word prediction, translation supports, and speech recognition to help</p>
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grading. It allows you to give students fast, effective feedback and track writing progress over time.

**ReachDeck Toolbar** is a web accessibility toolbar that helps you to make your website more inclusive for all.

**ReachDeck Auditor** is a website accessibility auditor and reporting suite.

**ReachDeck Editor** is a content creation and reviewing tool with readability feedback.

**SpeechStream** is a highly flexible, cloud based, language and literacy support toolbar.

**Snapverter** is an easy to use add-on for Read&Write for Google Chrome™ that transforms classroom papers and files into readable PDF

documents for easy sharing and reading aloud via Google Drive.

**Snap&Read** offers the most complete toolkit available to meet the different ways students learn today, from students with reading challenges to advanced students who need organizational support.

**OrbitNote** allows you to transform and interact with documents in a completely different way. Create an accessible, dynamic and collaborative space that works for everyone.

**uPAR** identifies the reading accommodations that are right for each student.

If the system/service were to become non-

No



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	functions?	
	<p>Please attach a high-level architect diagram of the solution / service:</p> <p>Please provide a description of the information /data that will be stored /processed by the system / service (i.e name, email, address, telephone numbers, DOB, age, bank details, staff number, salary, NI number):</p>	<p>This can be provided on request if required.</p> <p><b>Read&amp;Write</b> A de-identified version of your email address (Google, Microsoft, Login ID)</p> <p><b>Equatio</b> Your email address (either Google, Microsoft, Facebook, LinkedIn, Twitter Login ID)</p> <p><b>Equatio Mathspace</b> Your email address (either Google, Microsoft, Facebook, LinkedIn, Twitter Login ID &amp; First Name, Last Name) Because Mathspace has a teacher dashboard and displays class rosters, and individual student Math documents some additional information is stored. This is stored in compliance with our <a href="#">Information Security Policy</a>, encrypted in transit and at rest. The data which is stored is:</p> <p>The student first and second name The student email address Their Google Profile image (if the school policy permits access) Teacher feedback for Mathspace assignments (Assignment score and teachers comments) The students Mathspace documents</p> <p><b>Equatio Chrome Extension</b> Your email address (Google ID)</p>



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ReachDeck/Browsearound portal to manage their subscription. In this instance we collect the following additional information:

The portal user's email address

**ReachDeck Portal (for ReachDeck Auditor):**

The Auditor feature does not process or store any personally identifiable information.

**ReachDeck Editor:**

Whilst the ReachDeck Editor does not request personal information, the purpose of the product is to help the User improve the readability of their content. Therefore the user will be entering information into this product. The information entered is sent to Texthelp for processing, however it is not stored and is deleted immediately after processing.

**WriQ** Your email address (Google Login ID)

Because WriQ has a teacher dashboard and displays class rosters, and individual student writing records some additional information is stored. This is stored in compliance with our [Information Security Policy](#), encrypted in transit and at rest. The data which is stored is:

The Teacher or Student first and second name  
The Teacher or Student email address  
Their Google Profile image (if the school



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An encoded string containing student writing and the types of errors in the document.

**Snapverter** Your email address (Google Login ID)

**OrbitNote** Your email address (Google Login ID)

When using the OCR Scanning feature, PDFs that are sent for OCR are stored by Texthelp for 24 hours to ensure repeated requests are cached for optimum performance. After this period, the PDF is automatically deleted.

The PDFs are stored in compliance with our data procedures and are encrypted at rest during this period.

**Fluency Tutor for Google** Your email address (Google Login ID)

Because Fluency Tutor has a teacher dashboard and displays class rosters, and individual student running records some additional information is stored.

This is stored in compliance with our [Information Security Policy](#), encrypted in transit and at rest. The data which is stored is:

The Teacher or Student first and second name  
The Teacher or Student email address  
Their Google Profile image (if the school policy permits access)  
Audio recordings of the student  
Their running record (WCPM and teachers



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This section describes some of Texthelp's policies which our employees must adhere to. This list is not exhaustive of all policies in place. Policies are available on request.

No.	Question	Comments / Answer
1	Please provide details of your policies, procedures and practices, as well as monitoring processes in relation to the below:	
1a	Health and Safety	<p>Texthelp has a health and safety policy, which is reviewed and updated annually. This policy is endorsed by our CEO, and contains the Directors objectives to provide, so far, as is reasonably practicable:</p> <ul style="list-style-type: none"><li>• a safe and healthy working environment for all employees</li><li>• safe systems of work for all employees</li><li>• to ensure that non-company personnel, visitors and residents are not exposed to risks to their health or safety because of the</li></ul>





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		Safety consultant.
1b	The Environment	Texthelp will continually strive towards environmental improvements and reducing our impact on the environment. We will endeavour to work closely and cooperate fully with legislative bodies.
1c	Corporate Social Responsibility	The company has a CSR team that are tasked with encouraging employees to support our local and global communities in line with our vision, mission, values, and behaviours
1d	Equal opportunities and non-discrimination	Equal opportunities and non-discrimination are covered by policies contained within each employees' company handbook. Texthelp are committed to ensuring equality of opportunity in the workplace.
1e	Data Protection and information Security	As part of the induction procedure, all employees are required to sign that they agree to and will abide by our



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			and understood what is required of them. Data protection and Information security are also key themes throughout our employee handbook as well as regular staff training taking place. More information can be found on the <a href="#">Compliance page</a> of our website.	
	1f	Anti-Bribery/Anti-Corruption	It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption. Our Anti-bribery and corruption policies are also contained within our	



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### Relevant Legislation and Regulatory Compliance

This section describes how Texthelp adhere to relevant legislation and regulatory requirements.

No.	Question	Yes/No/N/A	Comments / Answer
1	Is Texthelp compliant with all relevant statutory and regulatory requirements?	Yes	Texthelp complies with the relevant local, national and international laws and regulations as required.
2	The UK's Modern Slavery Act 2015 (the Act) aims to prevent all forms of labour exploitation and increase transparency of labour practices in supply chains. Can Texthelp provide assurance that any third parties or suppliers are abiding by the Act?	Yes	Texthelp has an Anti-Slavery Statement in compliance with the UK's Modern Slavery Act 2015. Texthelp does not currently seek assurance from its suppliers of conformance to the Act. Texthelp's main suppliers are Amazon AWS, Google, Microsoft & Nuance Communications all of whom have Modern Slavery Policies/People Trafficking Policies or Statements.
3	Please describe the processes in place to ensure the on-going monitoring of Texthelp's information security arrangements		Texthelp has an internal audit programme that runs throughout the year, and results from these will drive improvement to the company's security posture and processes. In addition



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			Denmark and Norway offices.
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## Data Protection and Governance

This section describes Texthelp's controls in regards to data protection, and the governance in place in the organisation.

No.	Question	Y/N/N/A	Comments / Answer
1	Does Texthelp have a formally appointed Data Protection Officer?		Yes, the company has an appointed Data Protection Officer. They can be reached at <a href="mailto:dataprotection@texthelp.com">dataprotection@texthelp.com</a>
2	Which types of data subject does your organisation process personal data on?		We collect data from customers, and product users. Customer contact and billing information is collected in the course of sales and support, and product user information is usually a login ID required through the use of our products. More information can be found in our <a href="#">Privacy Policies</a> .
3	What customer data is stored and why?	N/A	Texthelp collects customer data to enable us to process orders, for billing purposes, support purposes and to be able to provide updates on our products and services to our customers. This data could include: <ul style="list-style-type: none"><li>• First name and Last name</li><li>• Job title</li><li>• Address</li><li>• Email address</li><li>• Telephone number</li></ul>
4	For what purposes is the data collected?		Texthelp collects customer data to enable us to process orders, for billing purposes, support purposes. Product user information is collected to allow the user to access and use our software
5	Have you established the legal basis for every category of personal data you collect?		Yes. The legal basis is one of legitimate interest.



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			company's Data Protection Officer.
7	What product information is collected?		This varies depending on the product, however Texthelp only collect the minimal amount of data required. You can find further information on the data collected in our Privacy Policy for Texthelp products.
8	Does Texthelp process any special categories of personal data such as criminal background data or medical history information?	No	
9	Is a GDPR compliant form of data protection notification given when the information is collected? How often and on what basis is this notification reviewed or changed and by whom? i.e. Does it specify all rights under GDPR and shoe the reasons data is collected and processed?	Yes	Data protection notification is contained within the product(s) Terms of Use that the customer accepts prior to using the software. Details of Texthelp's compliance status is described on the 'Compliance' page of the company website at this location <a href="https://www.texthelp.com/compliance/">https://www.texthelp.com/compliance/</a>
10	Is there a process in place to handle Data Subject Access Requests?		Yes, DSARs are handled in accordance with the relevant legislation. More information can be found on our website.
11	Does Texthelp adhere to the principle of Privacy by Design/Default?	Yes	Our software solutions are designed to use a minimal amount of PII.
12	Can you confirm that all customer data or information containing personal information will be handled in	Yes	Protecting our customers' privacy and securely managing your data is a high priority for us. Texthelp is certified to ISO 27001:2013. We have multiple technical and organisational measures in place to maintain a high level of information security compliance.



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	on our behalf, then a data processing agreement in line with the GDPR would need to be agreed and signed.		<p>Access protected by two factor authentication</p> <p>All data must be stored in an ISO 27001 or equally secure facility</p> <p>All data must be backed up regularly and securely</p> <p>All data should be recorded in the data security management system</p> <p>Any relevant data security contracts that have been entered into between Texthelp and a Customer must be recorded in the Data Security Management System</p> <p>Texthelp product End-user personal information is stored in Amazon Web Services (AWS). We have entered into Standard Contractual Clauses with AWS to ensure we comply with the EU and UK GDPR rules on international transfers.</p>
13	Has the UK Information Commissioner issued any assessments against Texthelp or required an undertaking to be signed?	No	

## Service Information

The questions below provide additional detail on the services provided by Texthelp.

No.	Question	Y/N/N/A	Comments / Answer
1	Do you own/manage this environment? If not, are the services provided by you?	Yes	
2	At what address are the services that will be supporting the product/service located?		Texthelp Ltd., Lucas Exchange, 1 Orchard Way, Greystone Road, Antrim, Co. Antrim, Northern Ireland BT41 2RU
3	Will you be subcontracting		Texthelp product End-user personal information



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			<p>User settings</p> <p>We use cookies, local storage, your Google™ or Microsoft™ account, and our servers to store a user's settings, such as the currently selected voice, and any document annotations.</p> <p>We will not disclose your personal information to any other party other than in accordance with our <a href="#">Privacy Policy</a> and in the circumstances detailed below:</p> <ul style="list-style-type: none"><li>- Where we are legally required by law to disclose your personal information.</li></ul>
4	Has Texthelp been subject to any internal or external audits or reviews of your information security arrangements in the last 12 months?	Yes	Full audits of the company's information security systems are carried out by British Standards Institute (BSI) annually across Antrim, Australia, US, Denmark and Norway. Texthelp also has regular penetration tests carried out by a third party. This is done annually and bi-annually depending on the application's usage. Texthelp performs penetration testing by an internal team on a more frequent basis.
5	Is Texthelp's premises and its information systems based in the UK or another country within the European Economic Area? Does this include any backup systems or facilities as well as any other associated		<p>Texthelp's head office is based in Northern Ireland (Antrim). Texthelp also has offices in the UK (Preston) Massachusetts (Woburn), Australia (Brisbane), Denmark (Copenhagen, Kolding), Norway (Trondheim, Oslo, Bergen), and Sweden (Lund, Malmö).</p> <p>Texthelp has a remote location that is used as part of the company's Business Continuity Plan</p>



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			any Processing described in our privacy and cookie policies located at <a href="http://www.texthelp.com">www.texthelp.com</a> All personally identifiable information is used and held in accordance with our <a href="#">privacy and security policies</a> .
7	Will Texthelp be handling electronic or paper-based information, or both?		Largely electronic information only. Where the customer elects to send us paper information it will be electronically scanned and attached to the customer's record in our CRM and the paper copy subsequently shredded.
8	What method is used to transfer data between Texthelp and the customer?		Email encrypted via HTTPS
9	Does Texthelp own and manage its own email infrastructure, and does Texthelp enforce TLS?		Yes. TLS is enforced. All email traffic is sent using HTTPS
10	Describe Texthelp's process for handling data security incidents.		<p>In the event of a data security incident, whoever discovers the incident should notify, as a matter of urgency, the relevant Data Security staff including the CTO, CDO &amp; DPO.</p> <p>Our internal incident response process will then be initiated in line with our Information Security Incident Response Policy. This includes: identifying all customers and users that may be affected, and creating a notification list. All customers on the Notification List should be</p>





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				<p>data was accessed</p> <p>c. Steps Texthelp have taken to mitigate the impact</p> <p>d. Steps Texthelp will take to prevent recurrence</p> <p>A Downtime/Security Event should be logged using guidance contained in the <a href="#">Information Security Policy</a>. Where appropriate a response plan should be drafted and executed to prevent recurrence.</p> <p><b>Contact with authorities</b></p> <p>In the event of a <b>data security incident</b> classed as Level 1 (no data loss) there will be no contact with authorities. In the event of a security incident classed as Level 2 (possible data loss) then the <a href="#">Information Commissioner's Office</a> (UK) or if the breach involves data belonging to Australian citizens the <a href="#">Australian Information Commissioner</a> (AUS) or the breach involves data belonging to Norwegian citizens <a href="#">Norwegian Datatilsynet</a> (NO), <a href="#">Danish Data Protection Agency</a> (DK), <a href="#">Swedish Authority for Privacy Protection</a> (Sweden) will</p>	
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			provide an accurate report of the event). Affected customers will also be contacted in a similar timeframe if there is a possibility that a data loss has occurred. If a <b>criminal act</b> has occurred the local authorities should be contacted by either the DPO or a member of Data Security staff within 48 hours of the incident. If a <b>telecommunications</b> outage occurs at the building the DPO, IT Admin or a member of Data Security Staff will contact the relevant service provider in order to report the outage and begin the recovery process.
11	Describe how Texthelp guarantees that all data belonging to the customer will either be returned or permanently destroyed on the request of the customer?		Depending on the request from the Customer Texthelp will either destroy or return any Customer data. On completion of this process a guarantee will be given by Texthelp that this has taken place. The guarantee will be signed by the company's Data Protection Officer.

## Information Security Policy

The questions below provide details relating to the Texthelp information security policies that are in place.

No.	Question	Y/N N/A	Comments / Answer
1	Does Texthelp have a dedicated team dedicated to the	Yes	The posts within the company specifically



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			company's Data Security Team and Quality Manager are responsible for ensuring compliance with the technical controls contained within Annex A of ISO 27001.
2	Does Texthelp have a set of Information security policies?	Yes	The company has a set of information security policies to meet the requirements of ISO 27001
3	Are Texthelp's employees aware of the information security policies and have they been provided with any type of awareness training or on-going communications?	Yes	All new employees receive security awareness training during their induction procedure. All employees are required to undertake refresher training with the information security policies at their mid-year and year-end staff reviews. In addition, when significant changes are made to information security policies the relevant staff are informed.
4	Are visitors to Texthelp's premises informed about	Yes	All visitors are given health and safety advice and



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			and to carry visitor identification lanyards while on the premises.
5	How often are Texthelp's Information Security policies reviewed and updated, and who signs off these updates?		The company's information security policies are reviewed at least annually. If updates are required they are implemented by the author of the document (one of the Data Security Team) and the update is reviewed by the Quality Manager/DPO.

## Support &amp; SLAs

The following questions help the customer understand the level of service provided by Texthelp.

No.	Question	Y/N N/A	Comments / Answer
1	Does Texthelp offer a Service Level Agreement (SLA) for its services?	Yes	Product specific SLAs are available on request.
2	Does Texthelp have a mechanism to communicate the status of any known issues or outages for all its customers?	Yes	In the event of a period of downtime, Texthelp will provide a written (email) response to the customer.
3	Is there any fine print in Texthelp's SLA or contract	Yes	Texthelp shall use all reasonable commercial efforts, being no less than prevailing industry standards



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4	As part of Texthelp's contract or maintenance does Texthelp include provision for the patching and updating of servers and services?	N/A	Texthelp has a secure patching policy which is managed by our infrastructure team. Compliance with this Policy is audited to ensure that consistent controls are applied throughout the company to minimise exposure to a security breach.
5	Approximately, how often do Texthelp upgrade or update its applications?		Texthelp employs an agile methodology and as such performs software sprints of between 4 – 8 weeks. A sprint may result in an upgrade to the service, bug fixing or performance improvements. These are normally delivered seamlessly when the application starts.
6	Will these upgrades impact on the use of the applications or services?	No	There should be no impact on the use of the applications or services by an end user.
7	What mechanism or process will you use to notify me about any scheduled or emergency maintenance and how much notice will be given?		Maintenance that causes the service to cease for any length of time is very rarely required. However, should this be the case Texthelp will endeavour to give the customer notice as soon as Texthelp is aware of the need for such maintenance.
8	How can I contact you to get more information about unscheduled or extended downtime?		Via email to <a href="mailto:r.graham@texthelp.com">r.graham@texthelp.com</a> or telephone 028 9442 8105

## Human Resources Security

The following questions will provide evidence of how staff are managed in



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permanent and temporary staff, and third party contractors handling sensitive information? Please describe the level of vetting.

any person who is not legally entitled to work in the location they are being hired in. To ensure that we comply with that law and at the same time avoid unlawful racial discrimination against migrant workers, we will check that all persons, including local persons, who we intend to employ are entitled to work and entitled to do the work in question. All successful candidates will go through a pre-employment security check using either AccessNI for Northern Ireland based candidates or DBS for Great Britain based candidates or Creative Services for US candidates. Third party suppliers handling sensitive information are required to sign an NDA and/or



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			data. Third party suppliers to the company that have access to the physical premises are required to sign a Non-Disclosure Agreement as well as security vetting their own staff.
2	Are Texthelp personnel including any third parties required to sign non-disclosure or confidentiality agreements?	Yes	Employees are required to sign a contract that has clauses related to confidentiality and security. It is also included in our employee handbook.
3	Do you have a disciplinary process in place in Texthelp? Do you ensure that any intentional misuse of information is managed for employees or sub-contractors?	Yes	A disciplinary procedure exists within the company. This will be invoked for any instances of intended misuse of sensitive information. Third party transgressors will have contracts terminated for wilful misuse of information.
4	Do you have a process in place when an employee leaves in terms of retrieval of equipment or information and any on-going	Yes	A formal employee exit checklist exists to ensure that all company equipment, information and access to information is retrieved or



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			employment with the company.
5	In the event of staff resignation or termination how does Texthelp ensure timely removal of access rights?		The employee's line manager will inform HR which will trigger a notification to the Network Admin team who will immediately revoke all access to privileged information.
6	If a member of your staff breaches or attempts to breach the information security policy are appropriate procedures in place to manage this?	Yes	A disciplinary process will follow which may lead to termination of employment.
7	Do you have a documented, and currently implemented, employee onboarding and offboarding policy?	Y	The onboarding process covers a welcome email and information a few days before start, an overview of manager activities, a buddy plan for your role and expectations, elearning in an interactive way, people partners meeting for benefits and paperwork, meet the CEO where you get to understand the story of Texthelp, a





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## Technical Security

This section will provide an understanding of how your IT Infrastructure is secured from a technical perspective.

No	Question	Y/N N/A	Comments / Answers
1	What security controls are in place to keep Texthelp systems and data separate from other client's data?		Policies and procedures exist to satisfy all of the 114 controls contained within Annex A of the ISO 27001 standard. These include, but are not limited to: ISMS 1.2 Information Security Policy ISMS 1.3 Product Analytics Policy ISMS 1.4 Access Request Policy ISMS 1.5 Roles/Responsibilities/Authorisations Register ISMS 1.6 Audit Logging Policy ISMS 1.7 Backup Policy ISMS 1.8 Encryption & Cryptographic Policy ISMS 1.9 Access Control Policy ISMS 1.11 Network Security Policy ISMS 1.12 Privacy Notice for Employees & Job Applicants ISMS 1.13 Record Retention Policy ISMS 1.14 Security Patching Policy ISMS 1.15 Infrastructure Hardening Policy ISMS 1.16 Vulnerability Management Policy ISMS 1.18 Privacy Policy for Texthelp Products ISMS 1.19 Security Incident Response Policy ISMS 1.20 Acceptable Use, Mobile & Teleworking Policy ISMS 1.21 Information Classification & Labelling Policy ISMS 1.22 Password Policy ISMS 1.23 Statement of Applicability ISMS 1.24 Risk Treatment Plan ISMS 1.25 Asset owner Policy ISMS 1.26 Secure Development Policy ISMS 1.27 Social Media Policy ISMS 1.28 Texthelp Web Properties Cookie Policy ISMS 1.29 Data Subject Access Request Policy



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			Procedures TH 100 Business Continuity Plan TH 110.1 Disaster Recovery Policy
2	Are firewalls used to protect your systems and data from the internet and other untrusted networks?	Yes	We currently use Meraki MX firewalls.
3	Does Texthelp use any Intrusion detection technologies?	Yes	We have multiple tools in place for cyber security at different levels: <ul style="list-style-type: none"> <li>- Intruder   An Effortless Vulnerability Scanner for production monitoring, emerging threat analysis and potential incident reporting</li> <li>- Tenable for server-based emerging threats and patch notifications</li> <li>- AWS CloudTrail alarms for all items listed in AWS CIS Foundations Benchmark for infrastructure monitoring</li> <li>- Internal Meraki MX firewall</li> <li>- Internal Sophos endpoint protection</li> </ul>
4	How does Texthelp protect itself against malicious code such as viruses and malware?		Anti virus and anti malware detection software is employed by the company.
5	Does a process exist within Texthelp to ensure systems are securely patched?	Yes	The company has a Secure Patching Policy requiring all systems to be running the latest patches for operating systems.
6	Do you perform routine vulnerability scanning of your environments? If so, what tools are used?	Yes	All software is routinely scanned using the Whitesource vulnerability scanner during the development and QA process.
7	In order to determine your current security posture, would Texthelp be prepared to allow a customer permission to perform an initial vulnerability scan	No	The company's key services are hosted on AWS and Microsoft Azure neither of which would allow this. Vulnerability scanning is performed by Texthelp prior to deployment of new code.



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	Security procedures for protecting your systems against vulnerabilities?		which is to protect against vulnerabilities to the company's systems.
9	Are security logs monitored to detect malicious activity?	Yes	Texthelp perform event logging on servers, laptops and active networking devices to establish baselines and to help identify operational trends.
10	Do you correlate security events from different sources?	Yes	Each individual asset has a unique audit log trail, which can be used to correlate events in the event of a security incident.
11	Does Texthelp have regular penetration tests conducted by an external party? For example to test if a malicious party could gain access to the admin function?	No	Texthelp has regular penetration tests carried out by a third party. This is done annually and bi-annually depending on the application's usage. Texthelp performs penetration testing by an internal team on a more frequent basis.
12	If so, would Texthelp be happy to provide a copy of the penetration test report or a subset of the report?	No	For reasons of security Texthelp would be unwilling to provide a copy of the full test report. We are able to provide an executive summary of the results.
13	What standards does Texthelp's development team follow when designing the system; do they for example follow the OWASP Top 10 guidelines for designing secure applications?	Yes	The company has a Secure Development Policy that describes required methods of version control, secure coding standards, how test data is handled, third party components etc. The company does follow and test for the OWASP Top Ten online vulnerabilities. Members of the QA team are tasked with ensuring online test suites are current with this list at all times.
14	Does a change management process exist within the company, if so who authorises the changes and monitors compliance to the process?	Yes	We have a Change Control Policy to ensure any changes that need to be made do not have negative implications for other company processes or our information security. This policy requires managers to ensure that any changes are properly investigated prior to making the changes. The managers themselves authorise the changes. The change control process is audited in line with the ongoing audit programme.
15	Are Texthelp employees able to		The company has an Acceptable Use Policy that forbids the use of



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	encrypted?		
17	How is data securely wiped from IT equipment, or assets a customer's data is being held on?		Texthelp will ensure that where equipment is being disposed of, all data on the equipment (e.g. on hard disks, tapes or removable media) is removed and held securely until collected for shredding. Texthelp will ensure that where electronic media are to be removed from the premises for repair, where possible, the data is securely overwritten.
18	How does Texthelp control access to its datacentre or secure equipment rooms?		Texthelp's server rooms are secured by numeric keypad door locks. Locks to the floor on which the server room sits are secured by magnetic locks activated by fobs.
19	What types of encryption do Texthelp utilise to protect customer data? Example: <ul style="list-style-type: none"> <li>• <i>Link-Level Encryption (SSL/TLS)</i></li> <li>• <i>Storage-Level Encryption</i></li> <li>• <i>File-Level Encryption</i></li> <li>• <i>Other</i></li> </ul>		SSL/TLS, Storage-level encryption

## Application Web Services Security

The following section will detail application specific web services security

No.	Question	Y/N N/A	Answers / Comments
1	Read&Write for Windows - How is data transmitted over the internet?		All data sent by Read&Write is sent securely, encrypted in secure sockets (https). Read&Write supports TLS1.0 up to TLS 1.2 for its communications, however only the TLS1.2 protocol is



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need access to the internet?

user on first use.  
Certain features within Read&Write also need internet access to provide their functionality. These features can be configured to be on/off within the licencing. These features include:

- Check It - uses an online grammar checking service - no data that is sent to this service is ever saved, instead it is used to generate corrections and then discarded.
- Picture Dictionary - uses an online service to look up pictures for words
- Vocabulary Tool - uses an online service to look up the pictures for words, as per the Picture Dictionary
- Translator - uses the Google Translation service

Analytics are also recorded for



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	features hosted?		personal information is de-identified and encrypted before being sent). The "Sign In" web app for Read&Write is hosted on Microsoft Azure Europe <ul style="list-style-type: none"><li>• Read&amp;Write Check It feature uses online services that are hosted on Amazon - Oregon</li><li>• Read&amp;Write Picture Dictionary and Vocabulary online services are hosted on AWS in the eu-west-1 (Ireland) data centre</li><li>• Usage data is also collected through google analytics</li></ul>
4	Are web services continually monitored for vulnerabilities?	Yes	

## Communication Security

The following questions will identify how effective Texthelp's secure



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			implementing a <a href="#">zero trust security setup</a> .
2	Does Texthelp use any Wireless LAN technology and how is this secured?	Yes	WPA2-PSK & Google Oauth
3	How do Texthelp securely manage any third party access to its systems?	N/A	No third party access is permitted.
4	How does Texthelp securely transfer data over the internet?		Via SSL/TLS
5	Does Texthelp have controls in place to manage electronic communications methods? Including phone calls.		Emails are encrypted. Standard telephone lines are used.

## Access Control

This section will provide the customer with information on how Texthelp manages physical and logical access.

No.	Question	Y/N N/A	Answer / Comments
1	Does Texthelp enforce system lockouts and system enforced password expiries and complexity? Please also explain how its password	Yes	Passwords must be changed every 180 days. This is enforced by the company's systems with a set of reminders prior to the expiration date upon which, if the password has not been changed, the user is locked out of the system. The



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			passwords must be of a certain length, must contain a combination of alphanumeric characters in upper and lower case including symbols.	
2	Does Texthelp have a password policy? If so, does it regularly review the policy and who in the organisation is responsible for this?	Yes	Texthelp has a Password Policy that is regularly reviewed by the Network Administration Manager. Passwords must be changed every 180 days. This is enforced by the company's systems with a set of reminders prior to the expiration date upon which, if the password has not been changed, the user is locked out of the system. The user will be locked out of the system if they enter a password incorrectly more than 6 times. Password complexity: passwords must be of a certain length, must contain a combination of alphanumeric characters in upper and lower case including symbols.	
3	Are system access logs maintained and reviewed? If so, who is responsible for doing so and how long	Yes	System access logs are maintained and reviewed by the Network Administrator, CRM Administrator and individual product	





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	system privileges required for each user in Texthelp?		company is carried out on a 'need to know' basis. Access is only permitted for an information asset where the role requires it. Access is given based on a person's role at the time they join the company. It is also reviewed, and revoked if necessary, when their job role changes.
5	Does Texthelp utilise any database encryption for systems holding client information or data?	Yes	All data is encrypted in transit and encrypted at rest. End user email addresses are de-identified unless required for the functionality of the product.
6	How often do Texthelp review user access to ensure only the minimum access to information and systems is provided for staff to perform their current roles?		The only Customer information stored on Texthelp's systems will be the contact details of the Customer employee involved in negotiating the product purchase with Texthelp. This detail is stored in Texthelp's internal CRM to which all Texthelp employees have access. The login details of end-Users of the products are not accessible to Texthelp staff.
7	Do Texthelp have a cryptographic key management process and	Yes	Any cryptographic certificates being used on a Texthelp owned service/server will be documented against the asset



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## Business Continuity Management

The following questions will provide the customer with information regarding Texthelp's business continuity processes.

No.	Question	Y/N N/A	Comments / Answer
1	Does Texthelp have a business continuity management policy?	Yes	The BCP includes an offsite location that Texthelp data is replicated to. The location also acts as a remote location for a small group of staff to continue critical development functions should the main office be out of bounds for any reason. All other staff can work from home.
2	If so, would Texthelp be happy to provide a copy of your Business Continuity plan?	No	For reasons of security the main plan cannot be shared however, a redacted copy is provided <a href="#">here</a> .
3	Does Texthelp perform a scheduled exercise to support your BCM plan?	Yes	Audits are carried out annually on the various elements of the business continuity plan during which the various elements are tested .



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insight into how Texthelp manages physical security.

No.	Questions	Y/N N/A	Answers / Comments
1	Does the building or room that hosts Texthelp data have adequate physical protection from unauthorised access?	Yes	This is audited by a team of internal auditors every year and also annually by BSI during the company's continual assessment visits for ISO 27001
2	Describe the construction of external and storage area doors, e.g are they of strong construction and fitted with mortice deadlocks or security locks?		The doors are of solid wood construction which can only be accessed using electronic fobs with an audit trail of Users. Numeric key locks are also used.
3	Are there any buildings or storage areas that have windows at ground floor level, or at any other level easily reached from the exterior? How are these buildings or storage areas protected?	No	All floors are above ground level
4	Is appropriate protection in place to mitigate damage by fire, flood etc?	Yes	The company's premises adhere to buildings standard controls. Server rooms are located away from fire and flood sources as much as is possible. Fire extinguishers are located close to the server room.
5	What kind of fire suppression and detection system is deployed at the premises that will be used to store		Smoke detectors, fire alarm, fire extinguishers. However, customer assets are not stored in



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	detecting a fire in its incipient phase?		
7	Are there automated links to the fire suppression and management system with direct links to the fire station?	Yes	
8	Describe how fire precautions and suppression controls are maintained to ensure they remain fit for purpose?		The fire alarm is tested weekly. Fire drills are tested annually. Fire extinguishers are tested as per regulations by the fire service.
9	Are Texthelp's facilities designed to minimise damage to assets belonging to the customer from fire and fire-suppression action including the utilisation of fire segregation zones?	Yes	Customer assets are not stored in the Texthelp building.
10	Are there other appropriate fire prevention controls, and are they appropriately maintained, i.e. fire extinguishers?	Yes	At least two fire extinguishers exist on each floor of the building. One located close to the server room.
11	Has Texthelp's premises undergone a fire risk assessment and does it have an emergency plan in place?	Yes	This is carried out annually by the company's health & safety team.
12	Can Texthelp confirm that following any alterations to buildings or circumstances, that re-assessment will be performed with an explanatory statement provided if re-assessment was not pursued?	Yes	



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			entry systems and audit trail kept of their use.
14	Do Texthelp utilise auditable access controls to ensure that access is only given to authorised staff?	Yes	Access is only given to current employees. Stricter access control is applied to the server room and access to this is limited to the Network Admin team only.
15	How do Texthelp ensure that access is removed in a timely fashion once a staff member has left or is no longer authorised?		An Exit Procedure exists ensuring that Admin staff are notified and all permissions revoked as soon as the employee leaves the building.
16	Is there a formal visitor's process in place to ensure only authorised individuals have access to Texthelp's premises?	Yes	Visitors can only gain access to the reception area and are then required to sign in electronically stating their name and the company they represent. Visitors must sign out when leaving the building.
17	How are access to keys or passes controlled?		These are stored in a register and can be deactivated at any time. Each employee is issued with one fob for door entry. Unassigned fobs are stored under lock and key and are not activated until issued to an employee.
18	Do Texthelp require appropriate verification and	Yes	Other than delivery drivers. Visitors should make an



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			verification of their identity and completion of the sign-in process..
19	Do Texthelp provide appropriate instructions for visitors to inform them of the relevant health, safety and security requirements?	Yes	Visitors are made aware of the fire exits and of the security requirements. It should be noted that all visitors are accompanied by a Texthelp employee at all times while on the premises.
20	Describe the security controls protecting the location where information is being stored (e.g. physical entry arrangements - locked server cages, guarded access, video monitoring, and visitor access controls).		This has been described previously. Visitor access controls, locked server room, locked main doors.
21	What physical access and authorisation controls do Texthelp have for sensitive areas (areas that aren't data centres but which store or hold sensitive or confidential data e.g. comms rooms)? Describe how you ensure access to storage areas is restricted to only approved staff?		All sensitive information not stored in the server room is kept under lock and key and only accessible by specific employees.
22	What controls do Texthelp implement to control physical access for external support engineers?		External party support engineers are subject to the same access controls previously described as all visitors. They



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	CC TV, motion sensors, security guards and locks?		
24	Describe how Texthelp ensures security systems remain available and operational during a power outage?		Our Antrim site has a generator that starts automatically during a power outage. This keeps business critical systems running. The generator system is tested at least annually.
25	Will any customer data be remotely transferred to Hard Copy?	No	
26	Does Texthelp have a policy which states that papers containing sensitive data (including Texthelp information) must not be left unattended on desks for long periods or overnight such as a Clear Desk Policy?	Yes	The company operates a Clear Desk/Clear Screen policy. All paper containing sensitive information is shredded immediately after use. If it is required to be stored it is done so under lock and key and shredded at the earliest opportunity.
27	Describe the process for ensuring all database and access systems utilised to manage access or track customer assets are secured appropriately and backed up daily?		Daily backups (incremental) are taken and backed up to the company's secure remote location that is part of the company's business continuity plan.
28	What are the locations of resilient or backup data centres, or facilities?		Approximately 1 mile from Texthelp offices in Antrim, Northern Ireland.
29	What are the locations of all backups including both removable media and online backups?		No removable media backups are taken. Backups are stored in the company's



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	functions that have access to data including all support functions?		carried out in the company's offices in the UK (Antrim), UK (Preston) Massachusetts (Woburn) , Australia (Brisbane), Denmark (Copenhagen, Kolding), Norway (Trondheim, Oslo, Bergen), and Sweden (Lund, Malmö).
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## Maintenance

No.	Question	Y/N N/A	Comments / Answer
1	Prior to any maintenance, building work, upgrades or work that is undertaken by third party contractors, will a risk or health and safety assessment be undertaken and a permit to work issued?	N/A	This may be performed by the landlord from whom Texthelp lease the building. A confidentiality clause exists in the agreement with the landlord.

## Data in Transit

No.	Question	Y/N N/A	Comments / Answer
1	Can Texthelp provide a list of methods and devices	N/A	Texthelp does not store or transfer data via physical





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		<ul style="list-style-type: none"><li>• Vehicles</li><li>• USB</li></ul>		mentioned previously in this document.  Texthelp employees are subject to the company's acceptable use policy which prohibits the copying of data to external devices. Company owned laptops have their USB ports blocked to prevent writing/reading data to/from a USB storage device.
2	Do Texthelp's vehicles have satellite tracking devices that provide real-time data? And is it possible to communicate with the vehicles via radio or telephone?		N/A	Texthelp do not have any vehicles

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